

United States District Court  
For the Southern District of New York

Jason M. Santarcangelo, Esq. (JMS 4492)  
**DINES AND ENGLISH, L.L.C.**  
685 Van Houten Avenue  
Clifton, New Jersey 07013  
(973) 778-7575  
Attorney for Plaintiff, New Jersey Sports Productions, Inc.

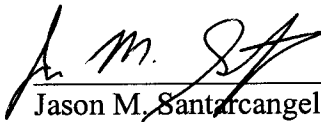
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<b>NEW JERSEY SPORTS PRODUCTIONS, INC :</b>	Civil Action No. 06 CV 1509 (HB)
<b>d/b/a MAIN EVENTS :</b>	
<b>Plaintiff, :</b>	
<b>v. :</b>	<b>REQUEST FOR DEFAULT</b>
<b>PANOS ELIADES, PANIX PROMOTIONS, :</b>	<b>AGAINST DEFENDANT PANIX</b>
<b>LTD., PANIX OF THE U.S., INC., BANNER :</b>	<b>PROMOTIONS LTD.</b>
<b>PROMOTIONS, INC., DON KING :</b>	
<b>PRODUCTIONS, INC. AND JOHN DOES 1-5 :</b>	
<b>Defendants. :</b>	

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Pursuant to Rule 55(a) Plaintiff, New Jersey Sports Productions, Inc. hereby requests that default be entered against Panix Promotions, Ltd. for failure to answer or otherwise respond.

In support thereof New Jersey Sports Productions, Inc. will rely on the certification of Jason M. Santarcangelo.

  
\_\_\_\_\_  
Jason M. Santarcangelo (JMS 4492)  
**DINES AND ENGLISH, L.L.C.**  
685 Van Houten Avenue  
Clifton, New Jersey 07013  
(973) 778-7575  
Attorney for Plaintiff, New Jersey Sports Productions, Inc.

Date: May 12, 2006

United States District Court  
For the Southern District of New York

Jason M. Santarcangelo, Esq. (JMS 4492)  
**DINES AND ENGLISH, L.L.C.**  
685 Van Houten Avenue  
Clifton, New Jersey 07013  
(973) 778-7575  
Attorney for Plaintiff, New Jersey Sports Productions, Inc.

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**NEW JERSEY SPORTS PRODUCTIONS, INC. :**  
**d/b/a MAIN EVENTS**

Civil Action No. 06 CV 1509 (HB)

**Plaintiff,**

**v.**

**PANOS ELIADES, PANIX PROMOTIONS,**  
**LTD., PANIX OF THE U.S., INC., BANNER**  
**PROMOTIONS, INC., DON KING**  
**PRODUCTIONS, INC. AND JOHN DOES 1-5 :**

**Defendants.**

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**CERTIFICATION OF**  
**JASON M. SANTARCANGELO**  
**IN SUPPORT OF REQUEST**  
**FOR DEFAULT**

1. I am an associate with Dines and English, LLC, counsel for New Jersey Sports Productions, Inc. in this matter.
2. On or about February 16, 2006 a complaint was filed against the above captioned defendants including Panix Promotions, Ltd.
3. On or about March 2, 2006, in accord with Section 306 of the Business Corporation Law of the State of New York, Michael Santarcangelo caused Panix Promotions Limited to be served by hand delivering to the Secretary of State, State of New York, the Summons, Complaint, Rule 7.1 Disclosure Statement and Service of Process Cover Sheet. A true copy of the summons is attached as Exhibit 1.

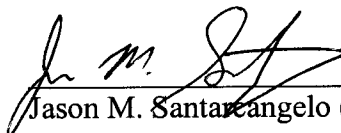
4. On or about March 8, 2006 Dines and English, L.L.C. on behalf of New Jersey Sports Productions, Inc. received a receipt for service from the State of New York, Department of State indicating that service was complete. A true copy of the receipt is attached as Exhibit 2.

5. On or about March 27, 2006 Pinsent Masons wrote to the court on behalf of Panix Ltd., requesting an extension of time for which to answer. In response, Judge Baer ordered "The Pretrial Conference in this matter is now set for May 11, so you need no adjournment. Please rest assured I have forwarded your note to counsel and now to the Clerk of Court here and the address change will, I trust, be resolved for the further. What you can or will do come May 11 is what I am more interested in. Please let me and your adversary know." A true copy of the letter and order is attached as Exhibit 3.

6. At the May 11, 2006 pretrial scheduling, no representative from Panix Promotions, Ltd. was present as evidenced by Judge Baer's order which does not bear the signature of any person representing Panix Promotions, Ltd. A true copy of the scheduling order is attached as Exhibit 4.

7. The time to answer or otherwise respond has passed. Panix Promotions, Ltd. has neither answered or otherwise responded since the March 27, 2006 and the entry of default is warranted.

I hereby certify that the above is true. If willfully false I recognize that I am subject to punishment.

  
\_\_\_\_\_  
Jason M. Santangelo (JMS 4492)

Date: May 12, 2006

# **EXHIBIT 1**

# United States District Court

Southern

DISTRICT OF

New York

New Jersey Sports Productions, Inc. d/b/a Main  
Events

## SUMMONS IN A CIVIL CASE

V.

CASE NUMBER:

Panos Eliades, Panix Promotions, LTD., Panix of  
the U.S., Inc., Banner Promotions, Inc., Don King  
Productions, Inc. and John Does 1-5

**06 CV 1509**

TO: (Name and address of defendant)

New York Secretary of State on behalf of Panix Promotions, LTD  
c/o Hal Adrion, Esq., Ruchelman Law Firm  
625 Madison Avenue/12th Floor  
New York, NY 10022

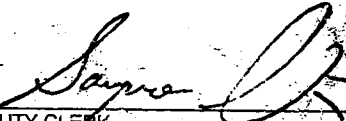
**YOU ARE HEREBY SUMMONED** and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Dines and English, LLC  
685 Van Houten Avenue  
Clifton, NJ 07013  
Attn: Patrick C. English, Esq.

an answer to the complaint which is herewith served upon you, within 35 days after service of this  
summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for  
the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period  
of time after service.

**J. MICHAEL McMAHON**

CLERK



(BY) DEPUTY CLERK

**FEB 22 2006**

DATE

## **EXHIBIT 2**

State of New York - Department of State  
Receipt for Service

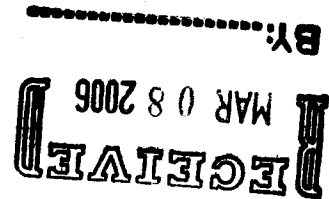
Receipt #: 200603030111  
Date of Service: 03/02/2006

Cash #: 200603030108  
Fee Paid: \$40 - CHECK

Service was directed to be made pursuant to: SECTION 306 OF THE BUSINESS  
CORPORATION LAW

Party Served: PANIX PROMOTIONS LIMITED

Plaintiff/Petitioner:  
NEW JERSEY SPORTS PRODUCTIONS, INC.



Service of Process Address:  
PANIX PROMOTIONS LIMITED, C/O HAL ADRION  
RUCHELMAN LAW FIRM  
625 MADISON AVE/ 12TH FLOOR  
NEW YORK, NY 10022

Secretary of State  
By AMY LESCH

## **EXHIBIT 3**



U  
Pinsent Masons

DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3-29-06

FAX

TO Hon. Harold Baer, Jr.

FAX NO. (212) 805-7901

United States District Court for the Southern TEL NO.  
District of New York, 500 Pearl Street, New York,  
New York 10017

FROM Pinsent Masons

SUBJECT Panix Promotions Limited (Company No. NO. OF PAGES (INCLUDING ANY ENCLOSURES) 3  
0285740) (In Liquidation) (the "Company")  
United States District Court, Southern District of  
New York- 06 CV 1509 & 01 CV 2709 (the  
"Litigation")

This fax transmission is intended for the addressee only. It is private, confidential and may be covered by legal professional privilege or other legal or other client privilege. If you have received this fax in error, please notify us immediately by telephone or fax and return it to us in the post.

**URGENT: PLEASE DELIVER IMMEDIATELY ON RECEIPT**

27 March 2006

Your ref

Our ref 20\20633905.1\JW\APD\101672.0  
7034

Dear Sirs

We act for Louise Brittain, a licensed Insolvency Practitioner and a partner in the firm of Baker Tilly, the Liquidator of the Company who was appointed by authority of the Secretary of State for Trade and Industry of the United Kingdom on 10 March 2006, pursuant to an order of the High Court of Justice in London, England of 8 March 2006. A copy of the Appointment is attached to this fax.

The Company was placed into compulsory liquidation, an English insolvency procedure, by the High Court of Justice in London on 8 March 2006 following a winding-up order made on behalf of a creditor. The Liquidator has taken over the executive powers of the directors of the Company and the directors powers have ceased.

The Liquidators' role is to investigate the financial affairs of the Company, to assess the claims of its creditors, to collect the Company's assets and to distribute them to the Company's creditors in the manner and priority prescribed by law in England and Wales. The fiduciary obligations of the Liquidator are owed primarily to the Company and its creditors.

We should be grateful if you would ensure that all further correspondence in relation to the Litigation, or any other ancillary matters concerning the Company, be sent to us at:

Pinsent Masons, 100 Barbirolli Square, Manchester, ENGLAND M2 3SS (Ref. JW/APD/101672.07034) Tel. 0044 161 250 0100/ Fax 0044 161 234 8235

100 Barbirolli Square Manchester M2 3SS United Kingdom

T +44 (0)161 234 8234 F +44 (0)161 234 8235 DX 14490 Manchester 2 www.pinsentmasons.com

LONDON BIRMINGHAM BRISTOL EDINBURGH GLASGOW LEEDS MANCHESTER BRUSSELS HONG KONG SHANGHAI  
ALLIANCES IN DENMARK DUBAI ESTONIA FRANCE GERMANY INDIA POLAND SPAIN SWEDEN USA

Regulated by The Law Society. A list of partners' names is available for inspection at the above address.

10012

PINSENTMASON

29/03/06 WED 09:50 FAX 0161 234 8235

The Liquidator would request an extension of time of 28 days from 29 March 2006 in which to familiarise herself with the Litigation 06 CV 1509 and to take legal advice on its merits in order that the matter can be progressed effectively and without unnecessary time and cost being incurred by the Court or any of the parties to the Litigation, 06 CV 1509.

We shall be in contact in due course.

Should you have any queries please contact Jamie White of this office on 0044 161 250 0115.

Yours faithfully

  
PINSENT MASONS

The PT can do this  
matter is now set  
for May 11 so you  
need no longer worry  
I have rest assured  
I have forwarded your letter  
to Charles & now to the  
Trust. He has agreed  
for the future. what you  
can or will do, come May 11  
is what I am more interested  
in. Please let me & your  
advisors know.

ORDERED

Harold Baer, Jr., U.S.D.J.

Date: 3/29/06

20120637283.112044

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2002

PINSENT MASONS 1

29/03/06 WED 09:50 FAX 0161 234 8235

## **EXHIBIT 4**

United States District Court  
For the Southern District of New York

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**NEW JERSEY SPORTS PRODUCTIONS, INC :**  
**d/b/a MAIN EVENTS,**

Civil Action No. 06-CIV-1509 (HB)

**Plaintiff,**

**v.**

**PRETRIAL SCHEDULING  
ORDER**

**PANOS ELIADES, PANIX PROMOTIONS,  
LTD., PANIX OF THE U.S., INC., BANNER  
PROMOTIONS, INC., DON KING  
PRODUCTIONS, INC. AND JOHN DOES 1-5, :**

**Defendants.**

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**APPEARANCES:**

Plaintiff(s) by:	Patrick C. English, Esq.	for New Jersey Sports Productions, Inc.
Defendants(s) by:	James J. Binns, Esq.	for Don King Productions, Inc.
	Raymond A. Levites, Esq.	for Banner Promotions, Ltd.
	Ella A. Kohn, Esq.	for Panos Eliades and Panix of the U.S., Inc.
		for Panix Promotions, Ltd.

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**HAROLD BAER, Jr., District Judge:**

Do the parties consent to proceed before a United States Magistrate for all purposes, pursuant to 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73?

Yes ☐ No ☒

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure, after holding an initial pretrial conference on notice to all parties, it is hereby ordered that:

Except under circumstances agreed to by the Court:

1. No additional parties may be joined after August 15, 2006. ✓

2. No additional causes of action or defenses may be asserted after the later of September 30, 2006, or the completion of discovery related to that parties' material actions or obligations in respect to the claim.

3. **Discovery:** All discovery, except for expert discovery, shall be commenced in time to be completed by December 15, 2006.<sup>✓</sup> Disclosure of expert testimony, if any, will be made at least 45 days before the agreed to trial month. Evidence intended to contradict or rebut the subject matter of the expert testimony will be submitted within 21 calendar days after the disclosure made by the other party, subject only to further order of this Court. As the Court rarely grants extensions, any delays or disputes in the taking of discovery should be reported to the Court immediately.

4. **Motions:** No party may make a dispositive motion returnable after February 28, 2007.<sup>✓</sup> Either party may request (and will be given a date by Chambers) for oral argument. The above date is the date by which any motion shall be fully briefed (i.e., moving, opposition and reply papers) and a courtesy copy delivered to Chambers.

In deciding the last date to submit fully briefed motions and your agreed to trial month, keep in mind that the Court requires at least 60 days to decide dispositive motions.

5. **Joint Pretrial Order:** A joint pretrial order shall, unless waived by the Court, be submitted by April 30, 2007.<sup>✓</sup> The pretrial order shall conform to the Court's Individual Practice and Rules. Counsel may inquire of Chambers with respect to the filing date(s) for requests to charge, proposed voir dire, and motions in limine, but in no event are they to be submitted less than five (5) business days (fully briefed) before the date set for trial.

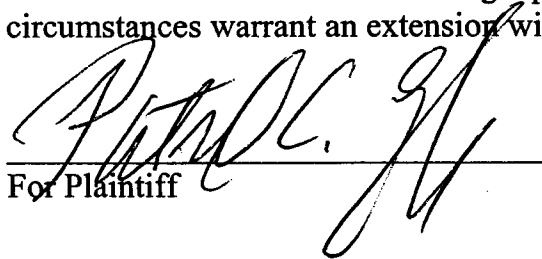
6. **Jury X. Non-Jury   .** Estimated number of trial days is 4. **This case is added to the May, 2007 Trailing Trial Calendar.** Counsel should not make any other commitments during this month. All cases will be tried within a reasonable time from the date of this pretrial conference based on the complexity of the case.

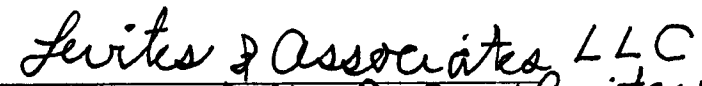
7. The law clerk assigned to this case is DAN SILVER, to whom all correspondence should be directed.

8. Upon request to Chambers by either side, the Court will schedule and conduct a settlement conference and/or mediation. The Court will also, upon request, facilitate mediation under the Court Mediation Program or a settlement conference before your Magistrate Judge. In the case of a mediation to be conducted by the Court, all parties must bring their respective clients to the mediation. Keep in mind, closure, for the most part, is accomplished in direct proportion to how early in the litigation the mediation occurs. Any ADR procedure must occur within the framework of this order.

9. Whenever a case is resolved, the parties must submit an Order of Discontinuance, signed by all parties. When the parties settle within forty-eight hours of trial or the filing of a dispositive motion, they must notify the Court immediately of such settlement, and fax to the Court no less than thirty-six hours prior to their planned appearance, an Order of Discontinuance (copy attached), signed by all parties.

10. The parties' signatures below represent their understanding and agreement that this schedule is final and binding upon them unless the Court concludes that extraordinary circumstances warrant an extension with respect to one or more than one of the scheduled dates.

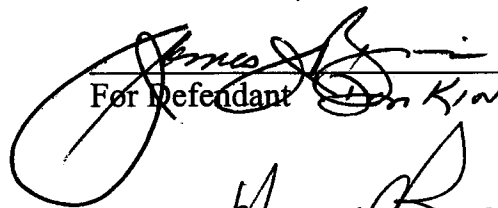
  
For Plaintiff

  
For Defendant BY: R.A. Levites  
BANNER PROMOTIONS, INC.

For Defendant

  
For Defendant Panos Eliades & Partner of Y&S Inc.

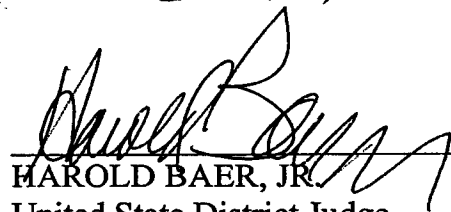
For Defendant

  
Don King Productions

SO ORDERED.  
DATED:

New York, New York

5/11/06

  
HAROLD BAER, JR.  
United State District Judge